REMARKS

Applicant thanks the Examiner for the indication that the previous objection to the

drawings, as well as the previous objection to claim 10, have been withdrawn.

Applicant also thanks the Examiner for the indication that the previous rejections under

35 U.S.C. § 112, first paragraph and second paragraph, have been withdrawn.

Claim Objections

Claim 12 has been objected to because the phrase "writing data in said second storage

means data as instructed by a processor" is improper. Applicant has deleted the second

occurrence of the word "data." Applicant respectfully submits that this rejection should be

withdrawn.

Claim Rejections

Claim 12 has been rejected under 35 U.S.C. § 112, second paragraph, as lacking

antecedent basis for the phrase "said second storage means." Applicant has amended the claim

to recite "a second storage means." Applicant respectfully submits that this rejection should be

withdrawn.

Claims 1, 2, 4, 5, 11-13, 15, 16, 18 and 19 have been rejected under 35 U.S.C. § 102(e) as

allegedly being anticipated by U.S. Patent No. 6,820,211 to Kalman ("Kalman"). Applicant

traverses this rejection.

Kalman does not disclose or suggest at least a logical disk writing/reading means for

writing data in said second storage means when instructed by said processor unit and reporting

completion of writing to said processor unit, as recited in independent claim 1. The Examiner

alleges that Kalman's operation of waiting for the next data request (OA, page 4), is an

indication of completion. However, Kalman's decision action in block 208 of Fig. 3 is not,

despite the Examiner's assertion to the contrary, a report of completion as set forth in the claim.

The logical disk writing means recited in claim 1 reports proper completion of writing to the

processor unit, allowing the processor unit to properly terminate data writing. The logical disk

writing means does not merely stop writing as disclosed by Kalman. Therefore, even broadly

construed, Kalman's lack of a writing operation in block 208 of Fig. 3 is not equivalent to

reporting completion of writing to the processor unit, as set forth in the claim.

For at least the above reasons, independent claim 1 is patentable over Kalman.

Independent claims 11, 12, 15, 18 and 19 contain features similar to the features recited by claim

1 and are therefore patentable for similar reasons. Claims 2, 4, 5, 13 and 16 depend from one of

claims 1, 12 and 15 and are patentable at least by virtue of their dependencies.

Claims 6, 7, 9 and 10 have been rejected under 35 U.S.C. § 103(a) as allegedly being

unpatentable over Kalman in view of U.S. Patent No. 5,600,783 to Kakuta et al. ("Kakuta").

Applicant traverses this rejection.

The combination of Kalman and Kakuta does not disclose or suggest the features of

independent claim 6. As established above, Kalman fails to disclose or suggest at least a logical

disk writing/reading means for writing data in said second storage means when instructed by said

processor unit and reporting completion of writing to said processor unit. Claim 6 recites

features similar to these features, therefore Kalman fails to disclose or suggest at least these

features of claim 6. Kakuta does not cure the deficiencies of Kalman.

The Examiner relies on Kakuta merely to disclose reading data from a second storage

means based on a received processor command. Even if one of ordinary skill in the art at the

time the invention was made had been motivated to combine the references, the combination still

would not result in the claimed features.

Therefore, independent claim 6 is patentable over the combination of Kalman and

Kakuta. Claims 7, 9 and 10, which depend from claim 6, are patentable at least by virtue of their

dependency.

Claims 3, 8, 14 and 17 have been rejected under 35 U.S.C. § 103(a) as allegedly being

unpatentable over Kalman in view of Applicant's admitted prior art. Applicant traverses this

rejection.

The combination of Kalman and Applicant's admitted prior art does not disclose or

suggest the features of claims 3, 8, 14 and 17. As established above, Kalman fails to disclose or

suggest at least a logical disk writing/reading means for writing data in said second storage

means when instructed by said processor unit and reporting completion of writing to said

processor unit, as set forth in these claims by virtue of their dependencies on claims 1, 8, 12 and

15, respectively. Applicant's admitted prior art does not cure at least the above-noted

deficiencies of Kalman.

The Examiner relies on Applicant's admitted prior art to disclose a management table

updating means. Applicant's admitted prior art does not, however, disclose or suggest at least

the above-noted claim features. Therefore, even if one of ordinary skill in the art at the time the

invention was made had been motivated to combine the references, the combination still would

not result in the features of claims 3, 8, 14 and 17.

For at least the above reasons, claims 3, 8, 14 and 17 are patentable over The

combination of Kalman and Applicant's admitted prior art.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,
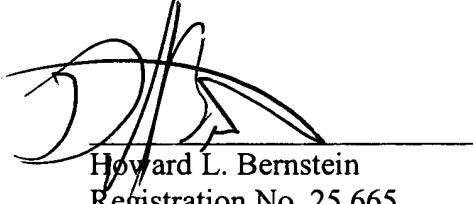
SUGHRUE MION, PLLC   Howard L. Bernstein
Telephone: (202) 293-7060   Registration No. 25,665
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: June 28, 2006